

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SAINT LAWRENCE COMMUNICATIONS LLC,	§	Case No. 2:15-cv-00349-JRG
	§	(Lead Case)
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
ZTE CORPORATION, ZTE USA, INC.,	§	
and ZTE (TX) INC.,	§	
	§	
Defendants.	§	
	§	
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SAINT LAWRENCE COMMUNICATIONS LLC,	§	Case No. 2:15-cv-00351-JRG
	§	(Consolidated Case)
	§	
Plaintiff,	§	JURY TRIAL DEMANDED
	§	
v.	§	
	§	
MOTOROLA MOBILITY LLC,	§	
	§	
Defendants.	§	
	§	

JOINT CLAIM CONSTRUCTION CHART PURSUANT TO P.R. 4-5(D)

Plaintiff Saint Lawrence Communications LLC (“Plaintiff” or “St. Lawrence”) and Defendants ZTE USA, Inc., ZTE (TX) Inc., (collectively, “ZTE”) and Motorola Mobility LLC (“Motorola”) (collectively, “Defendants”), hereby submit their Joint Claim Construction Chart pursuant to Local Patent Rule 4-5(d).

Appendix A is a chart listing the complete language of disputed claims with the disputed terms in bold type. The claims currently asserted by St. Lawrence are as follows:

- U.S. Patent Number 6,795,805: claims 1-3, 6, 21-23, and 26;
- U.S. Patent Number 6,807,524: claims 4, 5, 18, and 19;
- U.S. Patent Number 7,151,802: claims 1-3, 8, 49, and 52;

- U.S. Patent Number 7,191,123: claims 20, 21, 23, 25, 26, 28, 30, 31, 33, 34, 102, and 103; and
- U.S. Patent Number 7,260,521: claims 1, 2, 5-8, 10, and 28.

Appendix A contains the complete language of these asserted claims but also contains the complete language of any unasserted claims from which these asserted claims depend.

Appendix B contains the parties' proposed constructions for the disputed terms.

Dated: December 23, 2015

Respectfully submitted,

/s/Rose S. Whelan (by permission)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on December 23, 2015.

/s/ Michael McBride
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